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*Attorneys for Defendants Big Lots Stores, Inc. and PNS Stores, Inc.*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

Viola Hubbs, individually, and on behalf  
of other members of the general public  
similarly situated

Plaintiff,

vs.

Big Lots Stores, Inc., an Ohio  
corporation; PNS Stores, Inc., an Ohio  
corporation; and Does 1 through 10,  
inclusive,

Defendants.

CASE NO. 2:15-cv-01601-JAK-AS

**COMPENDIUM OF EVIDENCE IN  
SUPPORT OF DEFENDANTS'  
MOTION FOR CLASS SUMMARY  
JUDGMENT**

[Filed concurrently with Defendants'  
Notice of Motion and Motion,  
Defendants' Memorandum of Points  
and Authorities, Declaration of Mark  
Knueve, Declaration of Keith Mendes,  
Declaration of Brendan Burke,  
Declaration of Steven McClain,  
Declaration of Letty Jeric, Employee  
Declarations, and [Proposed] Order]

Date: April 16, 2018.  
Time: 8:30 a.m.

Judge: Hon. John A. Kronstadt  
Magistrate Judge: Hon. Alka Sagar  
Courtroom: 750-7th Floor

Defendants Big Lots Stores, Inc. and PNS Stores, Inc. hereby submit the following Compendium of Evidence in support of their Motion for Class Summary Judgment.

I. Declaration of Mark A. Knueve in Support of Defendants' Motion for Class Summary Judgment ("Knueve Decl.").

1. Attached as Exhibit A to the Knueve Decl. is relevant testimony from the deposition of Viola Hubbs.
2. Attached as Exhibit B to the Knueve Decl. is relevant testimony from the deposition of Brandon Coleman.
  - A. Exhibit 3 to the Deposition of Brandon Coleman is Brandon Coleman's Signed Associate Handbook Acknowledgment Form.
3. Attached as Exhibit C to the Knueve Decl. is relevant testimony from the deposition of Tamika Williams.
  - A. Exhibit 6 to the Deposition of Tamika Williams is Tamika Williams's Signed Acknowledgement of Receipt of California Associate Handbook.
4. Attached as Exhibit D to the Knueve Decl. is relevant testimony from the deposition of Letty Jeric.
  - A. Exhibit 9 to the Deposition of Letty Jeric is relevant policies from the Big Lots Associate Handbook – California.
5. Attached as Exhibit E to the Knueve Decl. is relevant testimony from the deposition of Williams Boas.
  - A. Exhibit 2 to the Deposition of William Boas is Big Lots's Nonexempt Pay – Stores Policy.
  - B. Exhibit 9 to the Deposition of William Boas is Big Lots's Closing Procedures Policy.
6. Attached as Exhibit F to the Knueve Decl. is relevant testimony from the deposition of Dominic Zuccala.
7. Attached as Exhibit G to the Knueve Decl. is relevant testimony from the deposition of Steven James McClain.
8. Attached as Exhibit H to the Knueve Decl. is relevant testimony from the deposition of Robert Stockwell.
9. Attached as Exhibit I to the Knueve Decl. is relevant testimony from the deposition of Carlos Estes.

10. Attached as Exhibit J to the Knueve Decl. is a true and accurate copy of the order granting summary judgment *Gonzalez v. Downtown LA Motors*, No. BC350769, (Los Angeles Ct. Super. Ct. June 20, 2011).

II. Declaration of Letty Jeric.

III. Declaration of Brendant Burke.

IV. Declaration of Steven James McClain.

V. Declarations of Employees.

VI. Declaration of Keith Mendez.

Dated: January 23, 2018.

/s/Mark A. Knueve

Mark A. Knueve (*pro hac vice*)

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*Attorneys for Defendants Big Lots  
Stores, Inc. and PNS Stores, Inc.*

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that on January 23, 2018, the  
3 foregoing and the exhibits referenced therein were filed with the Clerk of the  
4 Court for the United States District Court for Central District of California  
5 via the Court's CM/ECF system.

6 I certify that all participants in the case are registered CM/ECF users  
7 and that service will be accomplished by the Court's CM/ECF system.

8 /s/ Mark A. Knueve

9 Mark A. Knueve